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Attorneys for Defendant
FIDELITY NATIONAL TITLE INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BJK ENTERPRISES, INC.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE
INSURANCE COMPANY; HORIZON
NATIONAL TITLE INSURANCE, LLC;
DOES 1-IV; ROE CORPORATIONS I-IV,

Defendants.

Case No.: 2:19-CV-01776-KJD-VCF

**STIPULATION AND ORDER
EXTENDING DEFENDANT
FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO COMPLAINT**

(Second Request)

Plaintiff BJK Enterprises, Inc. ("Plaintiff") and Defendant Fidelity National Title Insurance Company ("Fidelity"), by and through their counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiff filed its complaint in the matter in Nevada's Eighth District Court in and for Clark County on September 9, 2019;

WHEREAS, Fidelity was served with the summons and complaint on or about September 23, 2019;

WHEREAS, Plaintiff's response to the complaint was originally due on or about October 15, 2019;



1 **WHEREAS**, the parties previously stipulated to extend Fidelity's time to respond to the
2 complaint to November 6, 2019;

3 **WHEREAS**, the parties are discussing the possibility of entering into a stipulation of
4 dismissal;

5 **WHEREAS**, this is the second stipulation for an extension of Fidelity's time to respond to
6 the complaint.

7 Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate
8 and agree as follows:

- 9 1. Fidelity shall file its response to the complaint on or before November 21, 2019.

11 Dated: November 4, 2019

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

12 By: /s/ Sophia S. Lau
13 SOPHIA S. LAU
14 Attorneys for Defendant
15 FIDELITY NATIONAL TITLE INSURANCE
16 COMPANY

17 Dated: November 4, 2019

GUINNESS LAW FIRM

18 By: /s/ Guinness Ohazuruike
19 GUINNESS OHAZURUIKE
20 Attorneys for Plaintiff
21 BJK ENTERPRISES, INC.

22
23 **ORDER**

24 **IT IS SO ORDERED:**

25
26 By: 
27 UNITED STATES MAGISTRATE JUDGE

Dated: 11-6-2019



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of EARLY SULLIVAN WRIGHT GIZER &
3 McRAE, LLP and that on November 4, 2019 the foregoing **STIPULATION AND PROPOSED**
4 **ORDER EXTENDING DEFENDANT FIDELITY NATIONAL TITLE INSURANCE**
5 **COMPANY'S TIME TO RESPOND TO COMPLAINT (Second Request)** was served on all
6 parties and counsel identified on the CM/ECF System via Electronic Notification, including on
7 the following counsel:

8
9 Guinness Ohazuruike
10 Guinness Law Firm
11 6845 W. Charleston Blvd., #A
12 Las Vegas, NV 89117
13 702-473-9300
14 Fax: 702-920-8112
15 Email: guinnesslaw@gmail.com

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